

### REMARKS

In response to the Office Action dated September 20, 2005, Applicants respectfully request reconsideration based on the above amendments and the following remarks.

Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-9 were rejected under 35 U.S.C. § 102(b) as being unpatentable over Bide. This rejection is traversed for at least the following reasons.

Claim 1 recites, *inter alia*, "the location information including an image of a target in the surroundings; providing a location identification device operative to receive the location information, to use the location information to determine identification information for the location in response to at least the image of the target." Support for this feature is found on at least page 12, lines 17-26 of Applicants' specification. Bide fails to teach this feature. Bide uses a point direction detector (PDD) and user position detector (UPD) to determine location and the direction a device is pointing. There is no discussion in Bide of using an image to derive the identification information.

For at least the above reasons, claim 1 is patentable over Bide. Claims 2-5 variously depend from claim 1 and are patentable over Bide for at least the reasons advanced with reference to claim 1. Claims 6-9 recite features similar to those discussed above with reference to claim 1 and are patentable over Bide for at least the reasons advanced with reference to claim 1.

Claims 12-16 were rejected under 35 U.S.C. § 103 as being unpatentable over Bide in view of Hakala. This rejection is traversed for at least the following reasons.

Claim 12 recites, *inter alia*, "responding to the determination by using location information to identify the location in response to at least an image of a target in the view of his or her surroundings." Neither Bide nor Hakala teaches or suggests identifying a location in response to at least an image of a target in the view of his or her surrounding. Bide uses a point direction detector (PDD) and user position detector (UPD) to determine location and the direction a device is pointing. Hakala uses a GPS unit 220 and a compass unit 230 to determine location and bearing for a device in order to display a map. Neither Bide nor Hakala teaches using an image to identify a location.

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For at least the above reasons, claim 12 is patentable over Bide in view of Hakala. Claims 13-17 variously depend from claim 12 and are patentable over Bide in view of Hakala for at least the reasons advanced with reference to claim 12.

In view of the foregoing remarks and amendments, Applicants submit that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130.

Respectfully submitted,

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